

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

IN RE: AMY COX DEBTOR(S) CROSSCOUNTRY MORTGAGE, LLC MOVANT V. AMY COX Debtor(s) LYNN E. FELDMAN Trustee Respondent(s)	Chapter 7 Case Number: 25-11490-amc
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TO: Amy Cox
2200 Benjamin Franklin Pkwy
Apt S514
Philadelphia, PA 19130-3648
Debtor

Amy Cox
2301 Cherry St.
Apartment 3P
Philadelphia, PA 19103
Debtor

Michael A. Cibik
Cibik Law, P.C.
1500 Walnut Street
Suite 900
Philadelphia, PA 19102
Attorney for Debtor

Lynn E. Feldman
2310 Walbert Ave
Ste 103
Allentown, PA 18104

United States Trustee
Office of United States Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107

Michelle J. Cunningham, Esquire
Marcus & Hoffman, P.C.
326 West State Street
Media, PA 19063
Notice Party

CrossCountry Mortgage, LLC has filed with the Court a Motion for Relief from the Automatic Stay under 11 USC §362(d) in order to proceed with its rights under non- bankruptcy law with regard to the Property, located at 2301 Cherry St., Apartment 3P, Philadelphia, PA 19103.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **June 13, 2025 (14 days from service of this notice)**, you or your attorney must do all of the following:

(a) file an answer explaining your position with the Clerk's Office located at: Clerk of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

In Philadelphia:

900 Market Street, Suite 400
Philadelphia, PA 19107-4299

In Reading:

U.S. Bankruptcy Court, Clerks Office
The Gateway Building
201 Penn Street, Suite 103
Reading, PA 19601

If you mail your answer to the Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to movant's attorney:

Brian Nicholas
McCalla Raymer Leibert Pierce, LLP
325-41 Chestnut Street, Suite 800
Philadelphia, Pennsylvania, 19106
Telephone: 732-685-6835
brian.nicholas@mccalla.com

and to the Trustee:

Lynn E. Feldman, Trustee
2310 Walbert Ave
Ste 103
Allentown, PA 18104

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in this motion.
3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on June 25, 2025 at 12:30 p.m. via Zoom audio technology only (Meeting Info: 1-646-828-7666 (telephone number) 160 6807 8081 (meeting ID)).
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at (610) 208-5040 to find out whether the hearing has been canceled because no one filed an answer.

Dated : 05/30/2025

MCCALLA RAYMER LEIBERT PIERCE, LLP

By: /s/ **Brian Nicholas**
Brian Nicholas
McCalla Raymer Leibert Pierce, LLP
325-41 Chestnut Street, Suite 800
Philadelphia, Pennsylvania, 19106
Telephone: 732-685-6835
brian.nicholas@mccalla.com

Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase order invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements in support of right to seek a lift of the automatic stay and foreclose if necessary.